Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

In the Matter of)	
)	
Universal Service Contribution Methodology)	WC Docket No. 06-122

REPLY COMMENTS IN THE FORM OF A LETTER FROM 108 SCHOOL AND DISTRICT LEADERS FROM 38 STATES OPPOSING THE FEDERAL COMMUNICATIONS COMMISSION'S PROPOSAL TO ESTABLISH AN OVERALL CAP AND SUB-CAPS FOR THE UNIVERAL SERVICE FUND. RESPECTFULLY SUBMITTED BY THE ALLIANCE FOR EXCELLENT EDUCATION ON BEHALF OF THE SIGNATORIES.

August 26, 2019

Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: WC Docket No. 06-122

Dear Chairman Pai, Commissioner O'Rielly, Commissioner Carr, Commissioner Rosenworcel, and Commissioner Starks:

We, the undersigned school and district leaders, write to oppose the Federal Communications Commission's (FCC's) proposal to establish an overall cap on the Universal Service Fund (USF) and combine the E-rate and Rural Health Care (RHC) Program spending caps. As school and district leaders, we know firsthand how important reliable Wi-Fi is for providing students with a quality education, and we are concerned that the FCC's proposal would negatively impact the E-rate program.

The USF finances E-rate, the RHC Program, and two other programs that aim to improve communications for rural and low-income communities. We believe combining all four USF programs under one spending cap will create an environment where the programs must compete for funding. Moreover, the proposal to merge the spending caps for E-rate and the RHC Program muddles the distinct purposes of the two programs. E-rate was created to support schools and libraries, not rural health-care facilities.

Many of us supported the FCC's E-rate Modernization Orders in 2014, which prioritized funds for Wi-Fi and raised the annual E-rate spending cap. The E-rate Modernization Orders have been a huge success, increasing the number of students with access to high-speed broadband for digital learning from 4 million in 2013 to 45 million in 2018. Nonetheless, more than 2.3 million students still lack access to high-speed broadband. Therefore, it is crucial that the FCC maintain its full commitment to the E-rate program and not needlessly hinder its potential by capping the USF or combining the E-rate and RHC Program spending caps. Wi-Fi access in our schools and libraries is essential for preparing students for the modern digital economy.

Sincerely,

Alabama

Matthew Alexander Superintendent of Education Barbour County Alabama Chris Jenks Director of Technology Tuscaloosa City Alabama

¹ For more information, see EducationSuperHighway, 2018 State of the States: Expanding Digital Learning to Every Classroom, Every Day (San Francisco, CA: Author, 2018) http://stateofthestates.educationsuperhighway.org/?utm_source=esh&utm_medium=blog&utm_campaign=SotS18#n_ational.

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Arizona

Bill Sakelarios Charter Holder

Pace Preparatory Academy Inc.

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Kristin Turner Superintendent

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Indian Prairie CUSD #204

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